

9/30/03-02677

Capito, Bonnie P. (EFDLANT)

From: Jackson, Rodger W. (EFDLANT)
Sent: Monday, November 03, 2003 12:27 PM
To: Capito, Bonnie P. (EFDLANT)
Subject: FW: Response to Comments - Draft OU14 Phase I Tech Memo

AR

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-----Original Message-----

From: Doug.Bitterman@ch2m.com [mailto:Doug.Bitterman@ch2m.com]
Sent: Tuesday, September 30, 2003 4:29 PM
To: thornton.michelle@epamail.epa.gov; GeorgeL100@aol.com; townsend.gena@epa.gov;
christopherjk@cherrypoint.usmc.mil; JacksonRW@efdlant.navfac.navy.mil; george.lane@ncmail.net;
Stancin.Martin@ch2m.com; thornton.michelle@epamail.epa.gov
Subject: Response to Comments - Draft OU14 Phase I Tech Memo

Hello team:

Attached is a Response to Comments (RTC) document addressing NCDENR's and EPA's comments on the Draft OU14 Phase I Tech Memo. The NCDENR comment was relatively minor, but the response to the EPA comment might need to be discussed. Please review the RTC prior to the partnering meeting so that we can discuss the responses during the time period allocated for OU14. However, feel free to respond with your thoughts or concerns prior to the meeting if you wish.

The attached file is a PDF. We have been having difficulties lately transferring files via email to both George and Gena. Please let me know if you can't access the attachment and we'll figure something out.

Thanks!

Doug

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11/3/2003

Message

E-mail: dbitterm@ch2m.com

11/3/2003

Response to Comments

September 30, 2003

DRAFT PHASE I REMEDIAL INVESTIGATION INTERIM REPORT, OU14, SITE 90 MCAS CHERRY POINT, NORTH CAROLINA

Comments Received from George Lane, North Carolina Department of Environment and Natural Resources - Federal Remediation Branch - September 12, 2003

Comments:

I have reviewed this report and have only one comment:

Building 4075 is mentioned on pages 10 and 11 as a reference point for contamination (ie. contamination extends beyond Building 4075). However, I have been unable to find Building 4075 on any map or figure in this report. If it is there please indicate to me where it can be found. If it isn't, please label this building on the appropriate map in the final document.

Response:

The building number label will be added to Building 4075 on Figures 7 and 8 in the Final document.

Comments Received from Michelle Thornton, U.S. Environmental Protection Agency, Region 4, Waste Division - Federal Facilities Branch - September 24, 2003

Comments:

EPA has reviewed the above cited report which describes the Phase I Remedial Investigation (RI) activities at OU14, Site 90 and the proposed sampling activities for Phase II. We agree with the recommendation to conduct a comprehensive round of groundwater sampling using the existing wells within Site 90 (approximately 57 monitoring wells) and extending down gradient along the flight line beyond building 4075. We also understand and support the decision to initiate a Phase III investigation as a result of the down gradient CVOC contamination. It is important to note that the Final RI work plan (dated August 2002, page 4-1) identified that the soil exposure pathway is eliminated since the entire OU14 area is covered with concrete, and there is no surface water features within or immediately surrounding the OU14 area. However, it is now noted that exposed ground surface and surface water is present to the northwest of the site beyond the current extent of the investigation area. Thus, appropriate risk assessments (human health and ecological) should be included in the report.

Response:

We propose to evaluate during Phase II field investigation activities whether or not the assertions of the Final Work Plan cited above with regard to eliminating the soil and surface water exposure pathways and the need for ecological risk assessment remain valid given the expanded study area. The Phase II Interim Report, which will be prepared to present the Phase II sampling results and make recommendations for Phase III, will address these issues as part of the conclusions and recommendations.

In the absence of any data that provide a credible link between the chlorinated VOC (cVOC) plume in groundwater and the very limited areas of exposed ground surface and non-groundwater fed surface water bodies (drainage ditches) located in the far northwestern portion of the expanded study area, we do not currently support adding soil and surface water exposure pathways to the RI. The Phase II sampling data should help evaluate this issue.

With regard to ecological risk assessment, we intend to evaluate whether any viable ecological habitat exists within the expanded study area during Phase II field activities, and will report our findings, conclusions, and recommendations in the Phase II Interim Report. Based on currently available information, however, we do not see that ecological risk assessment is relevant or warranted with regard to the cVOC plume in groundwater at OU14. Of course, the Final OU14 RI Work Plan includes a human health risk assessment as part of RI activities.